

## REMARKS

It appeared to be more considerate to prepare a new string of claims than to encumber the record with voluminous amendments. The new claims very specifically recite a construction which is, in the opinion of the inventors and the undersigned, neither shown nor reasonably suggested by the references.

This invention has a specific purpose- slidably receiving someone at one elevation, wheeling that person to another location usually at a different elevation and slidably moving that person off of the transporter. All movements of the person are slidable (in all lateral directions), at elevations prescribed by where the person was and where he is to be put. Importantly, there is no structural impediment to movement of the person in any direction relative to that surface.

As an additional feature, the surface can be provided with sockets into which posts can be placed to provide a removable barrier to prevent the person from sliding off. But this is optional.

The table is moved up and down by a jack. This jack is a screw type. In particular, it is a locking screw. The thread of a locking screw is such that an axial force relative to a driving nut cannot prevail. The relationship between its threaded angle and the friction forces prevent it. This feature can eliminate a brake on the drive motor or on the screw itself. It is a fail-

safe arrangement wherein the device cannot go down unless the motor runs. Of course it will not go up without power, either.

The workings of this device are shrouded by a skirt which excludes hands, fingers and feet (for example). It eliminates "pinch points" which are a notorious source of litigation in moving devices.

The supporting wheels are freely turnable around their vertical axis, and lockable.

A lip can be provided which depends below the surface at an edge. A frightened person can hold onto it, giving him or her considerable assurance.

There results from all of this a very convenient and safe device to receive a person, for example from a bed or a gurney, at one elevation, to transport the person to another place, perhaps an operating table or a bed at another elevation, and then again slide them onto the next place. Nobody has to lift or lower the person. No trauma is caused by the raising or lowering the person, and little if any by sliding him or her.

As the search capably shows, the art is replete with devices that raise or lower a person. They routinely include a jack to do the work. The principal rejection, Peterson 6,540,250 is an excellent example.

Peterson shows a wheelchair. There are impediments to movement except from one side. The hinge plates are always in

the way, and the arms and back are usually in the way. This structure cannot be used for applicant's purposes. To take off these parts destroys Peterson's intended use.

It is correct that Peterson uses screws to raise and lower the wheelchair seat. He does not suggest that this is locking screw. Many or most screws do need locks and are not locking screws. Exert an axial force on them, and they can be rotated. Very often this is preferred, and then brakes are provided for safety and selection. Applicant's device is fail-safe. Movement only occurs as the consequence of motor power.

In some dependent claims, applicant recites the optional feature of sockets and posts to provide for removable lateral restraints. Peterson does not show these, either. Stensby has been cited to show removable posts. It is submitted that these are merely side arms from what is primarily a chair. The chair side arm does not relate to removable posts on a planar surface.

Further attention is called to applicant's "lips" 40. These depend below the upper surface. A person on the upper surface can hang onto these, because the ride can sometimes be scary. Peterson's lips 18 are not lips in this sense. They are well above the surface and are side arms. The idea of providing a way to hold on to the edge of the defined platform is not shown or suggested.

The above features have variously been combined in a new

base claim and a short group of dependent claims. As presented, it is respectfully submitted, these combinations are not shown nor reasonably suggested by any reference or combination of references.

Reconsideration of this patent application and allowance of the claims as now submitted are respectfully solicited.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Donald D. Mon".

Donald D. Mon  
Attorney for Applicant  
Registration No. 18,255

DDM: gk  
(626)793-9173